

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESALE PRICE
LITIGATION

THIS DOCUMENT RELATES TO ALL
CLASS ACTIONS.

MDL No. 1456

CIVIL ACTION: 01-CV-12257-PBS

Judge Patti B. Saris

DECLARATION OF CHARLES HANNAFORD

I, Charles Hannaford, under the penalty of perjury, hereby declare as follows:

1. I have personal knowledge of the facts stated below, would so testify in court if called upon to do so, and am competent to provide testimony.
2. I am the Fund Administrator for the Pipefitters Local 537 Trust Funds (the "Fund"). Our office is located at 35 Travis Street, Unit One, Allston, Massachusetts.
3. I am familiar with the records and documents maintained in the ordinary course of business by the Fund, and am familiar with the document governing the operation of the Fund. The Fund provides medical benefits, including a prescription benefit, to participants who are almost exclusively residents of the Commonwealth of Massachusetts.
4. The Fund was found to be an adequate class representative for Class 3 in this Court's January 30, 2006 Consolidated Order Re: Motion for Class Certification relating to Track I Defendants. I have been advised that other defendants, referred to as Track II Defendants, include: Abbott, Amgen, Aventis, Baxter, Bayer, Dey Labs, Fujisawa, Gensia (a member of the Sicor Group), Immunex, Pfizer, Pharmacia, Sicor, and Watson.
5. The Fund uses Blue Cross Blue Shield of Massachusetts ("BCBS of MA") as its third-party administrator to process medical benefit claims for our plan members. BCBS of MA has performed this function for us for many years. BCBS of MA compiled claims data for the

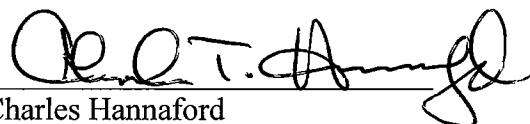
Fund showing AWP-based payments for physician administered drugs manufactured by both Track I and Track II Defendants. This claims data has previously been provided to Defendants in electronic form.

6. As Administrator of the Fund I authorized Fund counsel to survey the electronic claims records of the Fund. This search confirmed that the Fund made payments on behalf of Massachusetts residents based on AWP for those single-source and multi-source drugs manufactured by Track II Defendants reflected in the chart attached as Exhibit 1.

7. Specifically, the Fund made payments for drugs purchased by Massachusetts-resident beneficiaries that were manufactured by the following Track II Defendants: Abbott, Amgen, Aventis, Bayer, Baxter, Dey, Fujisawa, Immunex, Pharmacia, and Watson.

I make the foregoing statements under penalty of perjury on the date written next to my name below.

Date: March 8, 2006



Charles Hannaford

EXHIBIT 1**Pipefitters Local 537 Trust Fund
Summary of Track 2 Drug Coverage**

HCPCS Code	AWP Track 2 Manufacturer(s)	Drug Name(s)	HCPCS Description
J1070	Pharmacia	Depo-Testosterone	INJECTION - TESTOSTERONE CYPIONATE, UP TO 100 MG
J1080	Pharmacia	Depo-Testosterone	INJECTION - TESTOSTERONE CYPIONATE, 1 CC, 200 MG
J1100	Watson	Dexamethasone Acetate	INJECTION - DEXAMETHOSONE SODIUM PHOSPHATE, UP TO 4 MG/ML
J1260	Aventis	Anzemet	INJECTION, DOLASETRON MESYLATE, 1MG,1/100-10MG
J1440	Amgen	Neupogen	INJECTION, FILGRASTIM (G-CSF), 300 MCG
J1441	Amgen	Neupogen	INJECTION, FILGRASTIM (G-CSF), 480 MCG
J1561	Aventis/Bayer/Baxter	Gammagard	INJECTION - IMMUNE GLOBULIN, INTRAVENOUS, PER 500 MG
J1562	Aventis/Bayer/Baxter	Gammagard	IMMUNE GLOBULIN INTRAVENOUS (HUMAN), 10%, PER 5 GRAMS
J1563	Aventis/Bayer/Baxter	Gammagard	INJECTION - IMMUNE GLOBULIN, INTRAVENOUS, IG
J1642	Abbott/Baxter	Heparin/Heparin/Heparin	INJECTION - HEPARIN SODIUM, (HEPARIN LOCK FLUSH), PER 10 UNITS
J2920	Pharmacia	Solu-Medrol	INJECTION - METHYL PREDNISOLONE SODIUM SUCCINATE, UP TO 40 MG
J2930	Abbott	A-Methapred	INJECTION - METHYL PREDNISOLONE SODIUM SUCCINATE, UP TO 125 MG
J3010	Abbott	Fentanyl Citrate	INJECTION - FENTANYL CITRATE, UP TO 2 ML
J3360	Abbott/Watson	Diazepam/Diazepam IV	INJECTION - DIAZEPAM, UP TO 5 MG
J3370	Abbott/Baxter/Fujisawa/Watson	Vancomycin/Vancocin/Lyphocin/Vancomycin	INJECTION - VANOMYCIN HCL, UP TO 500 MG
J3490	Baxter	Brevibloc/Travasol/Bretylium	HOME INFUSION-UNCLASSIFIED DRUGS
J7030	Baxter	Sodium Chloride	INFUSION, NORMAL SALINE SOLUTION, 1000 CC
J7040	Baxter	Sodium Chloride	INFUSION, NORMAL SALINE SOLUTION, STERILE (500 ML OR 1 UNIT)

HCPCS Code	AWP Track 2 Manufacturer(s)	Drug Name(s)	HCPCS Description
J7050	Baxter	Sodium Chloride	INFUSION, NORMAL SALINE SOLUTION 250 CC
J7194	Baxter	Bebulin	FACTOR IX, COMPLEX, PER UNIT
J7625	Dey	Albuterol Sulfate/Ventolin/Proventil	ALBUTEROL SULFATE,0.5%, PER ML, INHAL SOLUTION ADMIN THRU DME
J9100	Pharmacia	Cytarabine	CYTARABINE HCL, 100 MG
J9250	Immunex	Methotrexate	METHOTREXATE SODIUM MIX, 2 CC OR 5 MG